

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
Petition of WorldCom, Inc. Pursuant)
to Section 252(e)(5) of the)
Communications Act for Expedited)
Preemption of the Jurisdiction of the)
Virginia State Corporation Commission)
Regarding Interconnection Disputes)
with Verizon Virginia Inc., and for)
Expedited Arbitration)

CC Docket No. 00-218

In the Matter of)
Petition of Cox Virginia Telecom, Inc.)
Pursuant to Section 252(e)(5) of the)
Communications Act for Preemption)
of the Jurisdiction of the Virginia State)
Corporation Commission Regarding)
Interconnection Disputes with Verizon)
Virginia Inc. and for Arbitration)

CC Docket No. 00-249

In the Matter of)
Petition of AT&T Communications of)
Virginia Inc., Pursuant to Section 252(e)(5))
of the Communications Act for Preemption)
of the Jurisdiction of the Virginia)
Corporation Commission Regarding)
Interconnection Disputes With Verizon)
Virginia Inc.)

CC Docket No. 00-251 /

**VERIZON VIRGINIA INC.'S OBJECTIONS
TO AT&T AND WORLDCOM'S SEVENTH SET OF DATA REQUESTS**

In accordance with the Procedures Established for Arbitration of Interconnection Agreements Between Verizon and AT&T, Cox, and WorldCom, CC Docket Nos. 00-218, 00-249, 00-251, DA 01-270, Public Notice (rel. February 1, 2001), Verizon Virginia Inc. ("Verizon") objects as follows to the Seventh Set of Data Requests served on Verizon jointly by AT&T and WordCom on August 8, 2001.

GENERAL OBJECTIONS

1. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them seek confidential business information covered by the Protective Order that was adopted and released on June 6, 2001. Such information will be designated and produced in accordance with the terms of the Protective Order.

2. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them seek attorney work product or information protected by the attorney-client privilege.

3. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is neither relevant to this case nor likely to lead to the discovery of admissible evidence, or otherwise seek to impose upon Verizon discovery obligations beyond those required by 47 CFR § 1.311 et seq.

4. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, are overly broad, unduly burdensome or vague.

5. Verizon objects to AT&T and WorldCom's Data Requests because the cumulative burden of responding to these 98 requests (some with multiple subparts), more than 500 prior requests (many with subparts), and subsequent requests, unfairly and excessively interferes with Verizon's ability to prepare its case. The timing of these requests impairs Verizon's ability to prepare its case because the same Verizon personnel whose expertise is necessary for responding to these requests are currently preparing Verizon's rebuttal testimony.

6. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information from independent corporate affiliates of Verizon Virginia Inc., or from board members, officers or employees of those independent corporate affiliates, that are not parties to this proceeding.

7. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information relating to operations in any territory outside of Verizon Virginia Inc. territory. According to the Arbitrator's letter of August 3, 2001, parties seeking information about Verizon's operations in other states must establish that "such information is relevant to the specific disputes over contract language presented in this proceeding."

8. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek discovery throughout the Verizon footprint. This proceeding involves only Verizon Virginia Inc. and relates only to the terms of interconnection and resale in Virginia.

9. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, seek information that is confidential or proprietary to a customer, CLEC or other third party. Verizon has an obligation to safeguard such information from disclosure. Thus, while Verizon may be in possession of such information, it does not have the authority to disclose that information to AT&T, WorldCom or any other entity.

10. Verizon objects to AT&T and WorldCom's Data Requests to the extent that all or any of them, when read in conjunction with the instructions and definitions contained therein, are redundant of prior data requests served by AT&T or WorldCom.

The General Objections identified above shall apply to each and every Data Request below.

DATA REQUESTS

1. Please provide a complete copy of all documentation (including workpapers, directions, guidelines, notes, calculations, source documents, memorandum, business cases, summaries, *etc.*) that relate to the claim at page 151 Verizon's Panel Testimony that "this enhanced capability is designed to reduce the costs Verizon VA (and the CLEC) incurs in connection with technician dispatches to investigate trouble reports — costs that otherwise would only increase as the volume of this type of service arrangement increases."

BEGIN VZ-VA PROPRIETARY

2. Please produce the documents identified in the following list as well as any more recent updates to these documents. Because these documents were produced under proprietary arrangements, AT&T and WCOM agree to use these documents under the protection of the protective agreement in place in this proceeding.
 - a. Please provide a complete copy of the document "Bell Atlantic Policy for ADSL Unbundling at the RT," dated June, 1999. Please also provide a complete copy of any more recent updates to this document.
 - b. Please provide a complete copy of the Verizon document "Packet from the Remote Terminal (PART) Service-East Technical Description."
 - c. Please provide a copy of the documents identified as VZ001971-3, provided as Confidential Attachment 1 to the Second Amended Verizon Response to Rhythms/Covad 2-15 in Docket No. 23537 at the Public Utility Commission of Texas.
 - d. Please provide a complete copy of all attachments, specifically including the "Network Planning Deployment Plan," to Verizon's (formerly Bell Atlantic-Maryland) response to Covad Data Request No. 1, question 15 in Case No. 8842 before the State of Maryland Public Service Commission. Please also supply any subsequent or updated version of the attached documents.
 - e. Please provide a complete copy of any business case that Verizon developed in making the decision to purchase a Wideband Test System. Please insure that Verizon's response includes a complete copy of Verizon network planning document NP-DP-99-155 and any subsequent updates.
 - f. Provide a copy of Verizon's "Outside Plant Engineering guidelines" (1998-000397) dated July, 1998 and any subsequent updates.

END VZ-VA PROPRIETARY

3. What is the vintage of the input expense data that Verizon used in its UNE studies? Was Verizon supplying the Daily Usage File product (as described at Verizon's Panel testimony at 239) in any portion of that period?
4. If Verizon claims that it took any specific step to exclude costs associated with the Daily Usage File product in developing the factors and loadings used in its study, please provide a specific reference to the workpaper page and line items that support that claim.
5. Why has Verizon proposed a per line customized routing charge rather than a per call charge?
6. Has Verizon performed or reviewed any analysis of how the OSS systems and functions it currently provides to competitive carriers might change as the result of the merger between GTE and Bell Atlantic? If so, please provide a complete copy of that analysis.
7. Has Verizon performed or reviewed any analysis of how the cost of the OSS systems and functions it currently provides to competitive carriers will change as the result of the merger between GTE and Bell Atlantic? If so, please provide a complete copy of that analysis.
8. Has Verizon performed or reviewed any analysis of how the OSS systems and functions modeled in its OSS recurring and its nonrecurring cost study differ from the corresponding assumptions in the nonrecurring cost studies currently supported in regulatory dockets by Verizon in former GTE areas? If so, please provide a complete copy of that analysis.
9. Are the inputs to the OSS UNE costs reflected in Verizon's recurring study (Exhibit Part F-15) the same or different from inputs to the OSS UNE costs that Verizon is currently sponsoring in Docket No. 23537 at the Public Utility Commission of Texas. If those costs are different, please explain why Verizon believes that it is correct to sponsor different costs in those two jurisdictions.
10. Does Verizon believe that it is appropriate to include the expenses associated with personnel who support UNE service order processing (*e.g.*, personnel who process any manual fallout associated with a UNE loop order) such as furniture, computers, building space, *etc.*, should be included as part of a non-recurring charge associates with UNE requests? If that is Verizon's position, please explain how that position is reflected in Verizon's current UNE cost studies.
11. Is it Verizon's position that the costs associated with its internal computer systems that process or provision service orders (such as SOP, LFACS, MARCH or TIRKS) should be included as part of a non-recurring charge associates with UNE requests? If that is Verizon's position, please explain how that position is reflected in Verizon's current UNE cost studies.

12. Please provide all available internal documentation that describes the specific systems modifications for which Verizon has included pre-ordering related costs in its studies for the following systems:
- Livewire/Premis
 - Billing and Order Support System ("BOSS")
 - Trunk Integration Records Keeping System ("TIRKS")
 - PHOENIX
 - Beacon/Sober
 - Service Order Processor ("SOP")
 - Work Force Administration System ("WFA")
13. Please provide a complete copy of each document that Mr. Minion and/or any of the other panel witnesses reviewed prior to filing their testimony to confirm that the costs in the study they are presenting relative to pre-ordering capabilities in the following systems are accurate and reasonable:
- Livewire/Premis
 - Billing and Order Support System ("BOSS")
 - Trunk Integration Records Keeping System ("TIRKS")
 - PHOENIX
 - Beacon/Sober
 - Service Order Processor ("SOP")
 - Work Force Administration System ("WFA")
14. Please provide all available internal documentation that describes the specific the development or modification of "interface systems" for which Verizon has included pre-ordering related costs in its studies for the following systems:
- Livewire/Premis
 - Billing and Order Support System ("BOSS")
 - Trunk Integration Records Keeping System ("TIRKS")
 - PHOENIX
 - Beacon/Sober
 - Service Order Processor ("SOP")
 - Work Force Administration System ("WFA")
15. Please provide a complete copy of each business case or other analysis that Verizon relied on to authorize each expenditure for development or modification of "interface systems" for which Verizon has included pre-ordering related costs in its studies for the following systems:
- Livewire/Premis
 - Billing and Order Support System ("BOSS")
 - Trunk Integration Records Keeping System ("TIRKS")
 - PHOENIX
 - Beacon/Sober
 - Service Order Processor ("SOP")

g. Work Force Administration System ("WFA")

16. Is any portion of the cost associated with Verizon employees participation in the "national standards bodies" referenced at page 248 of the Verizon's Panel Testimony included in the OSS cost filed in this docket? If "yes," please identify those costs. If "no," please explain specifically how the costs for such employee time are reflected in Verizon's books and how Verizon believes that that classification of costs should be treated in a forward-looking cost study of UNE costs.
17. Is any portion of the cost associated with Verizon employees participation in collaborative sessions included in the OSS cost filed in this docket? If "yes," please identify those costs. If "no," please explain specifically how the costs for such employee time are reflected in Verizon's books and how Verizon believes that that classification of costs should be treated in a forward-looking cost study of UNE costs.
18. Please provide all available internal documentation that describes the specific systems modifications for which Verizon has included ordering related costs in its studies for the following systems:
 - a. Direct Customer Access System ("DCAS")
 - b. Request Manager ("RM")
 - c. Request Broker ("RB")
 - d. X Service Order Generator ("XSOG")
 - e. Service Order Processor ("SOP")
19. Please provide a complete copy of each document that Mr. Minion and/or any of the other panel witnesses reviewed prior to filing their testimony to confirm that the costs in the study they are presenting relative to ordering capabilities in the following systems are accurate and reasonable:
 - a. Direct Customer Access System ("DCAS")
 - b. Request Manager ("RM")
 - c. Request Broker ("RB")
 - d. X Service Order Generator ("XSOG")
 - e. Service Order Processor ("SOP")
20. Please provide a complete copy of each business case or other analysis that Verizon relied on to authorize each expenditure for modifications for which Verizon has included ordering related costs in its studies for the following systems:
 - a. Direct Customer Access System ("DCAS")
 - b. Request Manager ("RM")
 - c. Request Broker ("RB")
 - d. X Service Order Generator ("XSOG")
 - e. Service Order Processor ("SOP")

21. Please provide all available internal documentation that describes the specific systems modifications for which Verizon has included provisioning related costs in its studies for the following systems:
- Service Order Analysis and Control ("SOAC")
 - Loop Facility Assignment and Control System ("LFACS")
 - Memory Administration Recent Change History ("MARCH")
 - SWITCH
 - Trunk Integrated Records Keeping Systems ("TIRKS")
 - Work Force Administration System ("WFA")
22. Please provide a complete copy of each document that Mr. Minion and/or any of the other panel witnesses reviewed prior to filing their testimony to confirm that the costs in the study they are presenting relative to provisioning capabilities in the following systems are accurate and reasonable:
- Service Order Analysis and Control ("SOAC")
 - Loop Facility Assignment and Control System ("LFACS")
 - Memory Administration Recent Change History ("MARCH")
 - SWITCH
 - Trunk Integrated Records Keeping Systems ("TIRKS")
 - Work Force Administration System ("WFA")
23. Please provide a complete copy of each business case or other analysis that Verizon relied on to authorize each expenditure for systems modifications for which Verizon has included provisioning related costs in its studies for the following systems:
- Service Order Analysis and Control ("SOAC")
 - Loop Facility Assignment and Control System ("LFACS")
 - Memory Administration Recent Change History ("MARCH")
 - SWITCH
 - Trunk Integrated Records Keeping Systems ("TIRKS")
 - Work Force Administration System ("WFA")
24. Please provide all available internal documentation that describes the specific systems modifications for which Verizon has included maintenance and repair related costs in its studies for the following systems:
- Special Access Remote Test System ("SARTS")
 - Work Force Administration System ("WFA")
 - DELPHI
25. Please provide a complete copy of each document that Mr. Minion and/or any of the other panel witnesses reviewed prior to filing their testimony to confirm that the costs in the study they are presenting relative to maintenance and repair capabilities in the following systems are accurate and reasonable:
- Special Access Remote Test System ("SARTS")
 - Work Force Administration System ("WFA")
 - DELPHI

26. Please provide a complete copy of each business case or other analysis that Verizon relied on to authorize each expenditure for systems modifications for which Verizon has included maintenance and repair related costs in its studies for the following systems:
 - a. Special Access Remote Test System ("SARTS")
 - b. Work Force Administration System ("WFA")
 - c. DELPHI
27. Please provide all available internal documentation that describes the work effort and costs for which Verizon has included access to maintenance and repair related costs in its studies for the Repair Trouble Administration System ("RETAS").
28. Please provide a complete copy of each document that Mr. Minion and/or any of the other panel witnesses reviewed prior to filing their testimony to confirm that the costs in the study they are presenting relative to access to maintenance and repair capabilities via RETAS are accurate and reasonable.
29. Please provide a complete copy of each business case or other analysis that Verizon relied on to authorize each expenditure for RETAS.
30. Please provide all available internal documentation that describes the specific systems modifications for which Verizon has included billing related costs in its studies for the following systems:
 - a. Customer Record Information System ("CRIS")
 - b. Carrier Access Billing System ("CABS")
31. Please provide a complete copy of each document that Mr. Minion and/or any of the other panel witnesses reviewed prior to filing their testimony to confirm that the costs in the study they are presenting relative to billing capabilities in the following systems are accurate and reasonable:
 - a. Customer Record Information System ("CRIS")
 - b. Carrier Access Billing System ("CABS")
32. Please provide a complete copy of each business case or other analysis that Verizon relied on to authorize each expenditure for systems modifications for which Verizon has included billing related costs in its studies for the following systems:
 - a. Customer Record Information System ("CRIS")
 - b. Carrier Access Billing System ("CABS")
33. For each of the following components of Verizon's reported OSS costs (as discussed at e.g., pages 273-275 of the Panel Testimony), please identify specifically how costs incurred for that function or component are categorized in Verizon's books on an ongoing basis for both Verizon's wholesale and retail operations:

- a. Expenses for in house work by the Information Systems ("IS") and Network organizations.
 - b. Expenses for in contractor work for the Information Systems ("IS") and Network organizations
 - c. Expenses generated by organizations that determine OSS process requirements.
34. For please describe specifically how Verizon treated costs in each of the accounts identified in part a)-c) of the preceding request in developing its costs for submission in this proceeding. If Verizon claims that it took any specific step to exclude costs associated with the OSS work for UNE and wholesale products in developing the factors and loadings used in its study, please provide a specific reference to the workpaper page and line items that demonstrate that claim.
35. For each of the following components of Verizon's reported OSS costs (as discussed at e.g., pages 273-275 of the Panel Testimony), please provide the most detailed documentation available within Verizon that identifies the specific purpose for and nature of each major expenditure:
- a. Expenses for in house work by the Information Systems ("IS") and Network organizations.
 - b. Expenses for in contractor work for the Information Systems ("IS") and Network organizations
 - c. Expenses generated by organizations that determine OSS process requirements.
36. Please provide Verizon's best estimate of the total number of employees involved in the following activities for its total operations (wholesale and retail) for each year from 1992 through 2000.
- a. In house work the Information Systems ("IS") and Network organizations.
 - b. Contractor work for the Information Systems ("IS") and Network organizations
37. Does Verizon plan to reduce the number of personnel employed in its Information Systems ("IS") and Network organizations once significant one-time development of OSS for UNE and wholesale services is complete? If "yes," please provide a complete copy of any internal documentation that describes those plans.
38. For each of the following components of Verizon's reported OSS costs (as discussed at page 285 of the Panel Testimony), please identify specifically how costs incurred for that function or component are categorized in Verizon's books on an ongoing basis for both Verizon's wholesale and retail operations:
- a. Capital-related General Purpose Computers investment

- b. Expenses associated with General Purpose Computers
- c. Systems and hardware maintenance costs.

39. Please describe specifically how Verizon treated costs in developing its costs for the following accounts for submission in this proceeding:

- a. Capital-related General Purpose Computers investment
- b. Expenses associated with General Purpose Computers
- c. Systems and hardware maintenance costs.

If Verizon claims that it took any specific step to exclude costs associated with the OSS work for UNE and wholesale products in developing the factors and loadings used in its study, please provide a specific reference to the workpaper page and line items that demonstrate that claim.

40. Please provide Verizon's best available estimate of its total costs (wholesale and retail) for each year from 1992 through 2000 for each of the following. Please also supply all workpapers or other supporting documents used to develop this response.

- a. Capital-related General Purpose Computers investment
- b. Expenses associated with General Purpose Computers
- c. Systems and hardware maintenance costs.

41. Please provide a complete copy of all documentation associated with the cost estimates developed by Verizon's Data Center, Network, and Distributed Resources group as mention at page 286 of the Panel Testimony. Please include copies of all documentation of the related requests made to that group, the analysis and all reports thereon.

42. For each of the following components of Verizon's reported OSS costs as discussed at page 285 of the Panel Testimony please provide the most detailed identification available within Verizon of the purpose for and nature of each significant expenditure. Please also supply all workpapers or other supporting documents used to develop this response.

- a. Capital-related General Purpose Computers investment
- b. Expenses associated with General Purpose Computers
- c. Systems and hardware maintenance costs.

43. Please identify each specific project that Mr. Minion and Ms. Prosini had in mind when they asserted "Further, Verizon had to defer or eliminate from consideration many beneficial information systems development projects in order to be able to finance this effort" at page 148 of their joint direct testimony in Maryland Public Service Commission Case No. 8879. For each project identified, please provide a

complete copy of all internal documentation that describes the project and establishes why the project was deferred or eliminated.

44. Please identify the number of lines of DSL service of any type that Verizon or any affiliate has in service in Virginia for each month for the last 24 months.
45. Do Drs. Gorden and Shelanski believe that forward-looking nonrecurring costs should be based on the same network architecture assumed in forward-looking recurring cost studies?
46. Why does Verizon believe it is appropriate to recover ongoing OSS expenditures in its "Access to OSS" charge?
47. Why does Verizon believe that it is appropriate to recover costs that have been incurred in the past through its proposed "Access to OSS" charge?
48. Please explain in detail how Verizon "the MIPS and GIG capacities for 1996, 1997, 1998, and 1999 were costed at 1999 rates" (see Verizon's Panel Testimony at 286). Please provide the basis for the assumption (including complete copies of any analyses or studies performed) and provide complete copies of any supporting documentation (including workpapers, calculations, source documents, memorandum, *etc.*).
49. What MIPS and GIG prices did Verizon pay in 2000 and 2001 (to date)?
50. Has Verizon discontinued use of any of the systems and/or functionalities for which Verizon included costs in its "Access to OSS" study? If yes, please identify the system and/or functionality and the date its use was discontinued and explain in detail why it was discontinued.
51. Does Verizon have plans to discontinue use of any of the systems and/or functionalities for which Verizon included costs in its "Access to OSS" study? If yes, please identify the system and/or functionality and the projected date its use will be discontinued and explain in detail why Verizon plans to discontinue it.
52. Have any of the systems and/or functionalities for Verizon included costs in its "Access to OSS" study been superseded by subsequent systems and/or functionalities? If yes, please identify the system and/or functionality that was replaced, the system and/or functionality that replaced it and the date of the replacement. Please explain in detail why the replacement was necessary.
53. Please identify each distinct system for which costs are included in Verizon's "Access to OSS" costs and the date that that system started operation. For each system, please provide a month-by-month breakdown of costs included in the "Access to OSS" cost study for each month subsequent to its deployment.

54. Please list each USOA account code to which any "Access to OSS" costs were charged.
55. For each account code listed in response to the previous request, please provide:
- a. the total costs included in Verizon's "Access to OSS study for each of the years 1996 – 2000
 - b. the level of expenses included in Verizon's recurring cost study.
56. Refer to the "Connect - Average Work Time" section of Verizon's Wholesale Non-Recurring Costs Study. For some elements, some task times are higher for the "additional" element than it is for the "initial" element (e.g., Verizon assumes more time to "Confirm the assignment by verifying that the cable and pair assignment is correct. Notify RCCC of any troubles and obtain new assignment" for the Line Port New Additional than for Line Port Initial). Please identify each task time for which the task time is higher for the "additional" element than it is for the "initial" element. For each such instance, please explain in detail why the "additional" would take longer than the "initial" and provide any supporting documentation.
57. Refer to the "Connect - Average Work Time" and "Disconnect - Average Work Time" sections of Verizon's Wholesale Non-Recurring Costs Study. For some elements, some task times are higher for "disconnect" than for "connect" (e.g., Verizon assumes more time to "Travel to remote/unmanned central office for the purpose of performing frame provisioning work" for the Two Wire New Initial, disconnect than for Two Wire New Initial, connect). Please identify each task time for which the task time is higher for the "disconnect" than it is for "connect." For each such instance, please explain in detail why "disconnect" would take longer than "connect" and provide any supporting documentation.
58. When a retail customer disconnects, does Verizon automatically dispatch a technician to disconnect the connection at the serving area interface (SAI) and/or remote terminal (RT) for that end user's loop? If the response is anything other than an unqualified "yes," please provide a complete description of Verizon's practice. Please provide a complete copy of each relevant method(s) and procedure(s) that instruct Verizon's personnel to follow the described practices.
59. When a retail customer disconnects, does Verizon automatically dispatch a technician to disconnect the connection at the NID/drop connection for that end user's loop? If the response is anything other than an unqualified "yes," please provide a complete description of Verizon's practice. Please provide a complete copy of each relevant method(s) and procedure(s) that instruct Verizon's personnel to follow the described practices.
60. Did Verizon exclude any portion of the cost of a complete loop (including a continuous path from the NID to the central office MDF) from the recurring cost of the loop? If so, identify which cost and demonstrate how that cost was

excluded. Also explain if Verizon always leaves that portion of the loop path unconnected until a specific customer service request is received. If Verizon believes that its existing engineering methods and procedures support the practices described in its response to this request, please provide a complete copy of each relevant methods and procedures.

61. When Verizon builds a new loop to a new residence development, does it test the loops built from the central office before completion? Please provide copies of any Verizon methods and procedures supporting your response.
62. When Verizon builds a new loop to a new business building, does it test the loops built from the central office before completion? Please provide copies of any Verizon methods and procedures supporting your response.
63. Please provide the methods and procedures detailing the work steps Verizon takes when a retail customer requests a disconnect.
64. Please provide the methods and procedures detailing the work steps Verizon takes when a wholesale customer (UNE, resale, UNE-P) requests a line disconnect.
65. If Verizon contends that a Wideband Test System will minimize the company's forward-looking cost (relative to its operations without such a system), please provide a complete copy of any financial analysis that Verizon intends to rely on to support that contention.
66. Does Verizon intend to transfer any portion of its Wideband Test System assets to an affiliate?
67. Will Verizon's affiliated advanced service provider have either access to Verizon's Wideband Test System or to the results of tests performed with that system?
68. Please identify each retail service that Verizon currently plans to provide to its retail customers for which Verizon will use its Wideband Test System to test on an ongoing basis.
69. If the splitter in a line sharing arrangement is located in the CLEC collocation space, how and in what circumstances would Verizon utilize its Wideband Test System?
70. Please state whether Verizon will provide requesting CLECs with electronic access to the Hekimian wideband testing equipment that Verizon plans to deploy.
71. Please state whether Verizon will provide requesting CLECs with access to the test results generated by the Hekimian wideband testing system that Verizon plans to deploy.

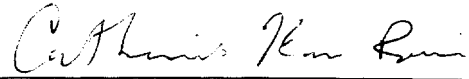
72. Are the costs that Verizon seeks to recover through the Wideband Testing System charge actually incurred or projected? If the former, please explain how such costs are forward-looking. If the latter, please explain in detail how Verizon has forecast the costs of a wideband testing system.
73. Did Verizon consider any testing systems other than the Hekimian wideband testing equipment? If yes, please explain why Verizon choose the Hekimian system and provide any analyses and/or documentation that supported this decision.
74. How does the current cost of the Hekimian wideband testing system Verizon will deploy compare to what Verizon paid for the system? Please provide any supporting documentation, workpapers or calculations that support your answer.
75. For each item that Verizon's Engineering personnel currently research to determine if an unbundled loop is DSL qualified on a competitive carrier's behalf (e.g., splice points, bridge taps, load coils, cable gauge, *etc.*), please indicate the name of any Verizon electronic database that is designed to hold that data (e.g., "Verizon reviews cable gauge information. LFACS is designed to include cable gauge information.") Please specify if any data that Verizon believes is required to qualify an unbundled loop for DSL services is not designed to be included in any current Verizon database/system (i.e., if the data is only found on paper records 100 percent of the time). If data resides both on mechanized systems and via paper records, please identify specifically what information resides on each and the extent to which the data, or portions thereof, are included in both.
76. Is Verizon currently analyzing the possibility or does it have any plans to expand mechanization of the process that it uses to process orders for line sharing on an individual line? If so, please provide a copy of all documentation relating to Verizon's planning effort.
77. For each Verizon database/system that contains or was designed to contain information that Verizon believes is relevant to the qualification of unbundled loops for DSL service, please indicate if it is possible to provide remote read only access to that database.
78. Please indicate the percentage of lines currently included in Verizon's mechanized loop qualification database, and the basis upon which those lines were selected for inclusion.
79. Please indicate with specificity the information currently provided in the mechanized loop qualification database, and in particular, any fields of data that are not specifically tailored to qualification of Verizon's retail offering.

80. Please describe any plans to include additional loop qualification information in the database, and the procedure that will be followed for augmenting the database both for line splitting and for line sharing. In particular, please explain, for offices already in the database, whether the augmentation will occur only after manual testing is performed.
81. Please provide a complete copy of the business case that Verizon relied on to support its decision to implement any modification to its OSS in order to support the implementation of line sharing.
82. Please provide a complete copy of the business case that Verizon relied on to support its decision to implement any modification to its OSS in order to support the implementation of DSL-related loop qualification.
83. Please explain how recurring charges for maintenance, administration, and/or miscellaneous support are consistent with a CLEC-provided, installed, and maintained splitter.
84. Does Verizon Virginia deploy wave division multiplexing? If so, what year did Verizon Virginia first deploy wave division multiplexing?
85. Does Verizon Virginia deploy dense wave division multiplexing? If so, what year did Verizon Virginia first deploy dense wave division multiplexing?
91. For Verizon's East-South region:¹
- a. What were the total resale lines in 1998, 1999 and 2000?
 - b. What were the total UNE loops in 1998, 1999 and 2000?
 - c. What were the total UNE platform and combinations in 1998, 1999 and 2000?
92. For Verizon's East region (both North and South):
- a. What were the total resale lines in 1998, 1999 and 2000?
 - b. What were the total UNE loops in 1998, 1999 and 2000?
 - c. What were the total UNE platform and combinations in 1998, 1999 and 2000?
93. What is the total number of access lines that Verizon currently has in its East-South region?

¹ Requests 91 through 96 request information beyond the Verizon-Virginia area. This material is directly relevant to the resolution of the appropriate cost for OSS costs and Access to OSS costs, one of several recurring costs to be decided as part of Issue I-1. In Verizon's Direct Panel Testimony at pages 294-295, Verizon explains that it calculated its proposed OSS rates using information from the Verizon East-South region as well as information from the Verizon East region. Specifically, Verizon states that it used "the levelized number of resold lines and UNE loops and platform/combinations" to generate its proposed OSS costs. Given that Verizon is relying on regionwide information to generate its proposed costs, AT&T/WCOM respectfully request this region-wide information to assess Verizon's proposed costs.

94. What is the total number of access lines that Verizon currently has in its East region (both North and South)?
95. What is the total number of retail access lines that Verizon currently has in its East-South region?
96. What is the total number of retail access lines that Verizon currently has in its East region (both North and South)?
97. List each Verizon serving wire center in Virginia where Verizon does not have equipment in place which would enable it to multiplex between DS-3 and DS-1 signals.
98. On page 3 of the Direct Testimony of Harold West, reference is made to the number of collocation arrangements CLECs have in place. Please provide the number of these collocation arrangements in Virginia which are being leased by CLECs that are either operating under bankruptcy protection or who have declared bankruptcy, in aggregate without revealing the CLECs' identification(s) or the locations of the collocation arrangements.

Respectfully submitted,



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Dated: August 13, 2001

CERTIFICATE OF SERVICE

I do hereby certify that true and accurate copies of the foregoing Objections to AT&T/WorldCom's Seventh Set of Data Requests were served electronically and by overnight mail this 13th day of August, 2001, to:

Dorothy Attwood (not served electronically)
Common Carrier Bureau
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554*

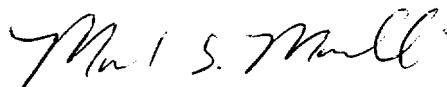
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* Served by hand delivery.